

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: Joseph Brown, Jr., : Chapter 13  
: :  
: Debtor(s). : Bankruptcy No. 18-12346

**NOTICE of Motion to Modify Plan Post-Confirmation**

Debtor Joseph Brown Jr has filed a Motion to Modify Plan Post Confirmation with this Court. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you want the Court to consider your views on the Motion, then on or before 4/12/2021, you or your attorney must:

File with the court a written response at:

U.S. Bankruptcy Court  
900 Market Street  
Philadelphia, PA 19107  
Attn: Bankruptcy Clerk

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must mail a copy to:

Michelle Lee, Esq.  
Margolis Edelstein  
170 S Independence Mall W Ste 400E  
Philadelphia, PA 19106

You or your attorney must attend the hearing scheduled to be held on 4/21/21 at 10:00 a.m. Hearing will be held via Telephonic Hearing. If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated: 3/26/2021

Respectfully Submitted,  
/s/ Michelle Lee  
Michelle Lee, Esquire